

2013 DEC -4 PM 1:30
OFFICE

November 25, 2013

Office of the General Counsel
Federal Election Commission
999 E Street, NW
Washington, DC 20463

MUR # 6764

Re: Lissa Squiers, Treasurer
Lissa Squiers for Congress Campaign
Identification No. C000523340

Dear General Counsel:

I am writing to register multiple complaints against my former, and potentially future, opponent for the Democratic nomination in the Seventh Congressional District of Texas, the Lissa Squiers for Congress Campaign and its Treasurer, Ms. Lissa Squiers.

First, I want to applaud the Commission for issuing the following four notices of the Squiers Campaign's failure to file four reports encompassing nearly a year's worth of campaign activity:

1. Notice dated Feb. 15, 2013 for failure to file a Year-End Report due on Jan. 31, 2013.
2. Notice dated May 3, 2013 for failure to file a First-Quarter Report due on April 15, 2013.
3. Notice dated Aug. 2, 2013 for failure to file a Second-Quarter Report due on July 15, 2013.
4. Notice dated Nov. 1, 2013 for failure to file a Third-Quarter Report due on Oct. 15, 2013.

Since FEC investigations are confidential and I was unable to locate any public Conciliation Agreement or Final Disposition, I assume the enforcement matter is on-going.

The Squiers Campaign did file a single report on Nov. 1, 2013 encompassing the entire missing period from Oct. 1, 2012 to Sept. 30, 2013 – an entire year.

www.JamesCargas.com

Cargas for Congress, 2450 Louisiana St., Suite 400-777, Houston, Texas 77006

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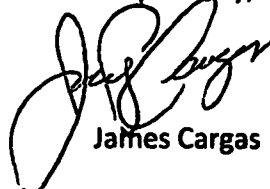
Second, I am respectfully registering my complaint with this single Nov. 1st filing, and am encouraging the Commission to make note of the pattern of violations and take action. The 2012 Year-End, 2013 First-Quarter, and 2013 Second-Quarter reports are all more than 30 days late. I understand the FEC considers any report more than 30 days late to have not been filed at all. Any resulting fines should take into account the Squiers Campaign's failure to file these three reports – even after the Commission staff provided notices of the delinquencies. Also, any resulting fines should be compounded by take into consideration each prior violation. As for the 2013 Third-Quarter Report, it was submitted 18 days late and represents the fourth violation. Each of the FEC's notices, the facts and allegations they contain, and the reports on-file with the Commission are incorporated herein. Having registered my formal complaint of these violations, I would appreciate notice of their final disposition once it becomes public.

And third, I believe there was a fifth deadline missed when the Squiers Campaign failed to file a Pre-Runoff Election Report by July 19, 2012 covering the period of July 1 to July 11, 2012. After a three-way May 29, 2012 Primary, Ms. Squiers and I faced off in the July 31, 2012 Runoff Election. A copy of the Harris County Clerk's Official Results is enclosed and can also be found at: <http://www.harrisvotes.com/HISTORY/20120731/cumulative/Dem/cumulative.pdf>.

The Commission's regulations require the Pre-Runoff Report to be filed 15 days before the election (July 19th or July 16th if by mail). 11 CFR § 104.5(a)(2). Although the receipts and disbursements for this period were including in the 2012 Third-Quarter Report filed on Oct. 25, 2012, no Pre-Runoff Report was ever filed. A copy of all filings made by the Squiers Campaign is enclosed. This is an election sensitive report and carries substantially larger fines. The fact that I prevailed in the runoff election does not mitigate the injury to the election process and the public's right to know the detailed undertakings of a congressional campaign prior to voting.

In sum, after the passage of a year, Ms. Squiers and her campaign have demonstrated a pattern of election law violations. After the FEC Staff sent multiple notices of these omissions, Ms. Squiers and her campaign still failed to file the missing reports. The recent single report covering an entire year's worth of campaign activity may stop the penalties from accruing, but does not change the willful and intentional nature of the violations. Furthermore, I believe a fifth violation exists for the Squiers Campaign's failure to file a Pre-Runoff Election Report.

Respectfully,



James Cargas

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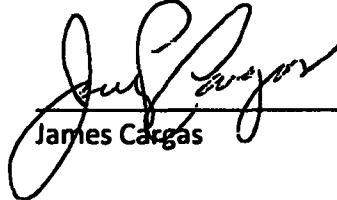
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Verification

James Cargas hereby verifies that the statements made in the above Complaint are, upon information and belief, true. Sworn pursuant to 18 USC § 1001.

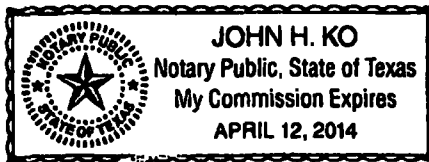

James Cargas


State of Texas)

County of Harris)

Sworn to and subscribed before me this 26 day of November, 2013.

(seal)




Notary Public

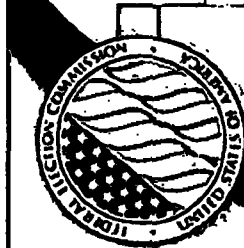
Cc: Ms. Deborah Chacona
Assistant Staff Director
Reports Analysis Division
Federal Election Commission

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CURRENT COMMITTEE INFORMATION

Name: LISSA SQUIERS FOR CONGRESS CAMPAIGN

Address: 6509 ROLLA, HOUSTON, TX 77055

Treasurer Name: Lissa Squiers

Type: H - House

Designation: P - Principal Campaign Committee Of A Candidate

Party: Democratic Party

2013

C00523340 CANDIDATE INFORMATION

[Squiers, Lissa](#)

Office: H - House

State: TX, District: 07

ID:
[H0TX07142](#)

Document Filed	Amended	Filed On	From Date	End Date	Pages	Page by Page	View / Download
RFAI - Failure to File - April Quarterly		05/03/2013	01/01/2013	03/31/2013	2	13330031136	PDF
RFAI - Failure to File - July Quarterly		08/02/2013	04/01/2013	06/30/2013	2	13330035395	PDF
RFAI - Failure to File - October Quarterly		11/01/2013	07/01/2013	09/30/2013	2	13330039988	PDF
October Quarterly	New	11/01/2013	10/01/2012	09/30/2013	20	13031134533	PDF

2012

Document Filed	Amended	Filed On	From Date	End Date	Pages	Page by Page	View / Download
Statement Of Organization	New	06/18/2012			5	12030822725	PDF
July Quarterly	New	07/15/2012	01/01/2012	06/30/2012	46	12030860734	PDF
October Quarterly	New	10/25/2012	07/01/2012	09/30/2012	19	12030932395	PDF
RFAI - Failure to File - Year-End		02/15/2013	10/01/2012	12/31/2012	2	13330023909	PDF



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-7

February 15, 2013

LISSA SQUIERS, TREASURER
LISSA SQUIERS FOR CONGRESS CAMPAIGN
6509 ROLLA
HOUSTON, TX 77055

IDENTIFICATION NUMBER: C00523340

REFERENCE: YEAR-END REPORT (10/01/2012 - 12/31/2012)

Dear Treasurer:

It has come to the attention of the Federal Election Commission that you may have failed to file the above referenced report of receipts and disbursements or failed to file a report covering the entire reporting period as required by the Federal Election Campaign Act, as amended.

It is important that you file this report immediately. The report must be filed with the Federal Election Commission, 999 E Street, N.W., Washington, DC 20463 for House candidates, or the Secretary of the Senate, 232 Hart Senate Office Building, Washington, DC 20510 (if sent via overnight delivery service) or Senate Office of Public Records, P.O. Box 77578, Washington, DC 20013-7578 (if sent via USPS) for Senate Candidates. Please note that electronic filers must submit their reports electronically, as per 11 CFR §104.18. A copy of the report must also be filed with the Secretary of State or equivalent State officer unless the State is exempt from the federal requirement to receive and maintain paper copies. You can verify the Commission's receipt of any documents submitted by your committee on the FEC website at www.fec.gov.

The failure to timely file a complete report may result in civil money penalties, an audit or legal enforcement action. The civil money penalty calculation for late reports does not include a grace period and begins on the day following the due date for the report. Due to heightened security screening measures, delivery of mail by the US Postal Service may be delayed. The Commission recommends that you submit your report via overnight delivery or courier service.